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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

PHILLIP SITBON,

Plaintiff,

v.

CITY OF PORTLAND, PORTLAND POLICE
BUREAU OFFICER CRAIG LEHMAN, and
JOHN DOES 1-10,

Defendants.

Case No. 3:22-cv-01148-SI

MOTION FOR EXTENSION OF TIME

(Unopposed)

LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, Jonathan Gersten, counsel for Plaintiff Phillip Sitbon, hereby certifies that he has conferred with Counsel for the Defendants and that they do not oppose this motion.

RELIEF REQUESTED

Plaintiff requests a Rule 16 Conference to adopt the proposed deadlines listed below.

ARGUMENT AND AUTHORITY

MOTION FOR EXTENSION OF TIME

The parties completed the Rule 26(f) conference on February 16, 2023. Given the parties' and counsels' schedules, they have agreed to the following proposed case management schedule:

Initial Disclosures: Friday, April 28, 2023

Close of Discovery: Friday, August 25, 2023

Deadline to Join Parties/Claims and Amend Pleadings: Friday, September 29, 2023

Expert Witness Disclosure: Friday, October 27, 2023

Expert Witness Discovery Exchange: Friday, December 15, 2023

Dispositive Motions: Friday, February 16, 2024

CONCLUSION

Based on the foregoing, Plaintiff requests that this unopposed motion be granted, and that the response deadlines be set.

DATED: March 17, 2023.

/s/Jonathan Gersten

Jonathan Gersten, OSB #191582

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Of Attorneys for Plaintiff